

STORZER & ASSOCIATES, P.C.

Sieglinde K. Rath (SR7208)
Roman Storzer, *admitted pro hac vice*
Robert L. Greene, *admitted pro hac vice*
1025 Connecticut Ave., N.W. Suite 1000
Washington, D.C. 20036
Tel: (202) 857-9766
Fax: (202) 315-3996
Attorneys for Plaintiffs

WILENTZ, GOLDMAN & SPITZER, P.A.

Donna M. Jennings (DJ7790)
90 Woodbridge Center Drive
Post Office Box 10
Woodbridge, New Jersey 07095
Co-Counsel for Plaintiff WR Property LLC

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA INC., a
New York non-profit corporation, and WR
PROPERTY LLC, a New Jersey limited
liability company,

Civil No. 3:17-cv-03226

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,

Defendant.

**PLAINTIFFS' NOTICE OF MOTION
TO FILE AMENDED COMPLAINT
FOR DECLARATORY JUDGMENT,
INJUNCTIVE RELIEF, AND NOMINAL
DAMAGES**

TO: Howard B. Mankoff, Esq.
Marshall Dennehy Warner Coleman & Goggin
425 Eagle Rock Avenue
Suite 302
Roseland, NJ 07068
Attorneys for Defendant, Township of Jackson, NJ

PLEASE TAKE NOTICE that the undersigned, Sieglinde K. Rath, of Storzer & Associates, P.C., counsel for Plaintiffs, and Donna M. Jennings of Wilentz, Goldman & Spitzer, P.A., co-counsel for Plaintiff WR PROPERTY LLC, hereby move for relief before the United States District Court, District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street Room 2020, Trenton, NJ 08608 for an Order permitting Plaintiffs to file an Amended Complaint in the form annexed as **Exhibit A** to the Declaration of Sieglinde K. Rath filed with this Notice of Motion.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, Plaintiffs shall rely upon the Declaration of Sieglinde K. Rath submitted in support of same. A proposed form of Order is also submitted. In the event this Motion is opposed, Plaintiffs respectfully request oral argument.

STATEMENT

Pursuant to Local Civil Rule of Federal Procedure 7.1(d)(4), Plaintiffs state that no brief is necessary because there are no points of law in dispute related to this Motion, which is a Motion for leave to file an Amended Complaint pursuant to Federal Rule of Civil Procedure 15.

STORZER & ASSOCIATES, P.C.

_____/s/_____
Sieglinde K. Rath (SR7208)
Roman P. Storzer *admitted pro hac vice*
Robert L. Greene *admitted pro hac vice*
1025 Connecticut Avenue, N.W.
Suite One Thousand
Washington, DC 20036
(202) 857-9766
Attorneys for Plaintiffs

CERTIFICATION OF SERVICE

I hereby certify that a copy of the within Notice of Motion, supporting Declaration of Sieglinde K. Rath and proposed form of Order in the above captioned matter has been served upon the following as follows:

Electronically Filed
Howard B. Mankoff, Esq.
Marshall Dennehy Warner Coleman & Goggin
425 Eagle Rock Avenue
Suite 302
Roseland, NJ 07068
Attorneys for Defendant, Township of Jackson, NJ

STORZER & ASSOCIATES, P.C.

_____/s/_____
Sieglinde K. Rath
Roman P. Storzer *admitted pro hac vice*
Robert L. Greene *admitted pro hac vice*
1025 Connecticut Avenue, N.W.
Suite One Thousand
Washington, DC 20036
(202) 857-9766
Attorneys for Plaintiffs

Dated: October 26, 2017